

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MICHAEL KULAKOWSKI,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO.
	)	3:16-CV-02510
	)	
WESTROCK SERVICES, INC.,	)	
	)	
Defendant.	)	

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DEPOSITION OF  
JERRY WAYNE HARVILLE  
Taken on Behalf of the Plaintiff  
November 16, 2017  
Commencing at 12:25 p.m.

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Reported by: Jerri L. Porter, RPR, CRR  
Tennessee LCR No. 335  
Expires: 6/30/2018

Brentwood Court Reporting Services  
(615) 791-6983 \* \* \* (888) 991-DEPO

- 1 A Two years ago, January.
- 2 Q How often do you receive the company
- 3 policies or handbook?
- 4 A Oh, probably once a year.
- 5 Q When you receive them, do you sign a piece
- 6 of paper saying you received them?
- 7 A Yes, ma'am.
- 8 Q Are you required --
- 9 A That we read them and stuff.
- 10 Q Right. Are you required to read them at
- 11 that time?
- 12 A Yes.
- 13 Q How long do you have to read them?
- 14 A Most of the time they give you a week.
- 15 Q Okay. And was that how it was at the main
- 16 plant?
- 17 A Uh-huh.
- 18 Q Had you ever had to deal with that at the
- 19 fulfillment center?
- 20 A No, ma'am.
- 21 Q Now, when you said that when Tommy Whited
- 22 would hit you you would hit him back, were you ever
- 23 concerned that you would lose your job because you
- 24 hit him back?
- 25 A No.

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1 Q Had you ever seen Tommy Whited hit or grab  
2 or kick a woman in the groin area?

3 A No.

4 Q Had Michael Kulakowski ever told you that he  
5 complained to Larry Eden about the way Mr. Whited  
6 was treating him?

7 A No.

8 Q Had you ever heard him complain to Larry  
9 Eden about the way Mr. Whited was treating him?

10 A No.

11 Q Has Mr. Whited ever shown his penis or  
12 private parts to you?

13 A No.

14 Q Okay. Has he ever requested oral sex or  
15 anything in that manner from you?

16 A No.

17 Q Have you ever heard of him doing either of  
18 those things to any other male employees?

19 A I've not seen him actually pull anything  
20 out, but I've seen him grab his zipper and state  
21 stuff like that.

22 Q To who?

23 A Michael Kulakowski.

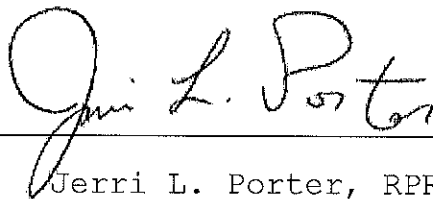
24 Q Like what did he state? I need you to say  
25 what he said. I know it could be crude.

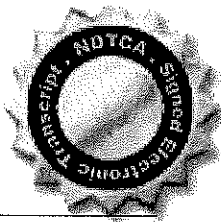
REPORTER'S CERTIFICATE

I, Jerri L. Porter, RPR, CRR, Notary Public and Court Reporter, do hereby certify that I recorded to the best of my skill and ability by machine shorthand all the proceedings in the foregoing transcript, and that said transcript is a true, accurate, and complete transcript to the best of my ability.

I further certify that I am not an attorney or counsel of any of the parties, nor a relative or employee of any attorney or counsel connected with the action, nor financially interested in the action.

SIGNED this 28th day of November, 2017.





Jerri L. Porter, RPR, CRR

My Notary commission expires: 2/19/2018

Tennessee LCR No. 335

Expires: 6/30/2018